IN THE SUPERIOR COURT OF JUDICATURE

IN THE HIGH COURT OF JUSTICE

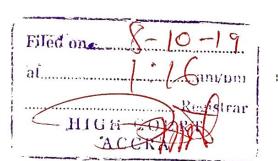
ACCRA - A.D. 2019

(R/100/4/2020)
Case No:

#### THE REPUBLIC

#### **VRS**

- 1. WILLIAM ATO ESSIEN
- 2. TETTEH NETTTEY
- 3. FITZGERALD ODONKOR
- 4. KATE QUARTEY-PAPAFIO



#### <u>Count One</u> <u>Statement of Offence</u>

Conspiracy to steal contrary to sections 23(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

1) William Ato Essien 2) Tetteh Nettey between October and November 2015 in Accra in the Greater-Accra Region agreed to act together with a common purpose to steal the sum of GH¢100,000,000 the property of Capital Bank Limited.

# Count Two Statement of Offence

Abetment of crime namely stealing contrary to sections 20(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

Fitzgerald Odonkor between October and November 2015 in Accra in the Greater-Accra Region abetted William Ato Essien and Tetteh Nettey to dishonestly appropriate the sum of GH¢100,000,000 the property of Capital Bank Limited.

# Count Three Statement of Offence

Stealing contrary to section 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

1)William Ato Essien 2) Tetteh Nettey between October and November 2015 in Accra in the Greater-Accra Region dishonestly appropriated the sum of GH¢100,000,000 the property of Capital Bank Limited.

# **Count Four Statement of Offence**

Money Laundering contrary to section 1(1)(a) of the Anti-Money Laundering Act, 2008 (Act 749).

#### Particulars of Offence

1) William Ato Essien 2) Tetteh Nettey between October and November 2015 in Accra in the Greater-Accra Region converted the sum of GH\$\psi\$100,000,000 knowing it to be proceeds of crime.

#### <u>Count Five</u> Statement of Offence

Conspiracy to steal contrary to sections 23(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

1) William Ato Essien 2) Tetteh Nettey between October and December 2015 in Accra in the Greater-Accra Region agreed to act together with a common purpose to steal the sum of GH¢30,000,000 the property of Capital Bank Limited.

# Count Six Statement of Offence

Abetment of crime namely stealing contrary to sections 20(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

Fitzgerald Odonkor between October and December 2015 in Accra in the Greater-Accra Region abetted William Ato Essien and Tetteh Nettey to dishonestly appropriate the sum of GH¢30,000,000 the property of Capital Bank Limited.

#### <u>Count Seven</u> Statement of Offence

Stealing contrary to section 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

1) William Ato Essien 2) Tetteh Nettey between October and December 2015 in Accra in the Greater-Accra Region dishonestly appropriated the sum of GH¢30,000,000 the property of Capital Bank Limited.

## Count Eight

## Statement of Offence

Money Laundering contrary to section 1(1)(a) of the Anti-Money Laundering Act,

Particulars of Offence

1) William Ato Essien 2) Tetteh Nettey between October and December 2015 in Accra in the Greater-Accra Region converted the sum of GH¢30,000,000 knowing it to be proceeds of crime.

#### Count Nine

## Statement of Offence

Abetment of crime namely stealing contrary to sections 20(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

## Particulars of Offence

Fitzgerald Odonkor in January 2016 in Accra in the Greater-Accra Region abetted William Ato Essien to dishonestly appropriate the sum of GH¢35,000,000 the property of Capital Bank Limited.

#### Count Ten

## Statement of Offence

Stealing contrary to section 124(1) of the Criminal Offences Act, 1960 (Act 29).

## Particulars of Offence

William Ato Essien in January 2016 in Accra in the Greater-Accra Region dishonestly appropriated the sum of GH¢35,000,000 the property of Capital

## Count Eleven

## Statement of Offence

Money Laundering contrary to section 1(1)(a) of the Anti-Money Laundering Act, 2008 (Act 749).

## Particulars of Offence

William Ato Essien in January 2016 in Accra in the Greater-Accra Region converted the sum of GH\$435,000,000 knowing it to be proceeds of crime.

## **Count Twelve**

## Statement of Offence

Abetment of crime namely stealing contrary to sections 20(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

Fitzgerald Odonkor in June 2015 in Accra in the Greater-Accra Region abetted William Ato Essien to dishonestly appropriate the sum of GH¢2,000,000 the property of Capital Bank Limited.

# Count Thirteen Statement of Offence

Stealing contrary to section 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

William Ato Essien in June 2015 in Accra in the Greater-Accra Region dishonestly appropriated the sum of GH¢2,000,000 the property of Capital Bank Limited.

#### <u>Count Fourteen</u> Statement of Offence

Money Laundering contrary to section 1(1)(c) of the Anti-Money Laundering Act, 2008 (Act 749).

#### Particulars of Offence

William Ato Essien in June 2015 in Accra in the Greater-Accra Region took possession of the sum of GH¢2,000,000 knowing it to be proceeds of crime.

#### <u>Count Fifteen</u> Statement of Offence

Abetment of crime namely stealing contrary to sections 20(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

Fitzgerald Odonkor in September 2015 in Accra in the Greater-Accra Region abetted William Ato Essien to dishonestly appropriate the sum of GH\$\psi\$5,000,000 the property of Capital Bank Limited.

#### <u>Count Sixteen</u> Statement of Offence

Stealing contrary to section 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

William Ato Essien in September 2015 in Accra in the Greater-Accra Region dishonestly appropriated the sum of GH¢5,000,000 the property of Capital Bank Limited.

#### <u>Count Seventeen</u> <u>Statement of Offence</u>

Money Laundering contrary to section 1(1)(c) of the Anti-Money Laundering Act, 2008 (Act 749).

#### Particulars of Offence

William Ato Essien in September 2015 in Accra in the Greater-Accra Region took possession of the sum of GH¢5,000,000 knowing it to be proceeds of crime.

#### <u>Count Eighteen</u> <u>Statement of Offence</u>

Abetment of crime namely stealing contrary to sections 20(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

Fitzgerald Odonkor in September 2015 in Accra in the Greater-Accra Region abetted William Ato Essien to dishonestly appropriate the sum of GH¢12,000,000 the property of Capital Bank Limited.

#### <u>Count Nineteen</u> Statement of Offence

Stealing contrary to section 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

William Ato Essien in September 2015 in Accra in the Greater-Accra Region dishonestly appropriated the sum of GH¢12,000,000 the property of Capital Bank Limited.

# **Count Twenty Statement of Offence**

Money Laundering contrary to section 1(1)(c) of the Anti-Money Laundering Act, 2008 (Act 749).

#### Particulars of Offence

William Ato Essien in September 2015 in Accra in the Greater-Accra Region took possession of the sum of GH¢12,000,000 knowing it to be proceeds of crime.

#### Count Twenty-One Statement of Offence

Abetment of crime namely stealing contrary to sections 20(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

Fitzgerald Odonkor in October 2016 in Accra in the Greater-Accra Region abetted William Ato Essien to dishonestly appropriate the sum of GH¢8,500,000 the property of Capital Bank Limited.

# Count Twenty-Two Statement of Offence

Stealing contrary to section 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

William Ato Essien in October 2016 in Accra in the Greater-Accra Region dishonestly appropriated the sum of GH¢8,500,000 the property of Capital Bank Limited.

# **Count Twenty-Three** Statement of Offence

Money Laundering contrary to section 1(1)(c) of the Anti-Money Laundering Act, 2008 (Act 749).

#### Particulars of Offence

William Ato Essien in October 2016 in Accra in the Greater-Accra Region took possession of the sum of GH¢8,500,000 knowing it to be proceeds of crime.

#### Count Twenty-Four Statement Of Offence

Conspiracy to steal contrary to sections 23(1) and 124(1) of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

1)William Ato Essien 2) Kate Quartey-Papafio between June and August 2017 in Accra in the Greater-Accra Region agreed to act together with a common purpose to steal the sum of GH¢70,000,000 the property of Capital Bank Limited.

#### Count Twenty-Five Statement of Offence

Stealing contrary to section  $\overline{124(1)}$  of the Criminal Offences Act, 1960 (Act 29).

#### Particulars of Offence

1)William Ato Essien 2) Kate Quartey-Papafio between June and August 2017 in Accra in the Greater-Accra Region dishonestly appropriated the sum of GH¢70,000,000 the property of Capital Bank Limited.

## Count Twenty-Six Statement of Offence

Money Laundering contrary to section 1(1)(c) of the Anti-Money Laundering Act,

Particulars of Offence

1)William Ato Essien 2) Kate Quartey-Papafio between June and August 2017 in Accra in the Greater-Accra Region disguised the sum of GH¢70,000,000 knowing it to be proceeds of crime.

DATED AT THE OFFICE OF THE ATTORNEY-GENERAL THIS 8TH DAY OF OCTOBER, 2019.

> CHIEF STATE ATTORNEY FOR: ATTORNEY-GENERAL

THE REGISTRAR HIGH COURT ACCRA